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VIA ECF

April 16, 2020

Honorable Claire C. Cecchi, USDJ
United States District Court
Martin Luther King Jr. Courthouse
50 Walnut Street
Newark NJ 07102

RE: Discover Growth Fund, LLC v. Fiorino, et al.,
Civil Action No. 2:20-cv-00351 (CCC)(MF)

Dear Judge Cecchi:

We are counsel to Discover Growth Fund, LLC, the plaintiff in the captioned action ("Discover"). On April 8, 2020, the defendants filed a Motion to Dismiss Plaintiff's Corrected Amended Complaint [Doc 10], returnable May 4, 2020 ("Motion"). Based upon my conversation with Your Honor's Law Clerk yesterday, it is my understanding that the Court's Standing Order 2020-04 applies to motion practice and provides for a 45 day extension of Discover's time to file opposition to the Motion. Pursuant to L. Civ. R. 7.1(d)(2), our opposition would otherwise be due on April 20, 2020, or 14 days before May 4, 2020.

As such, I understand that, pursuant to Standing Order 2020-04, our opposition to the Motion would now be due on June 4, 2020. If my understanding is correct, I ask that Your Honor cause this letter to be "So Ordered". Defendants' counsel, John E. Jureller, Jr., Esq., has not yet consented to this request.

As always, we appreciate the Court's time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "DEB", is written over a horizontal line.

Dale E. Barney
Director

Cc: John E. Jureller, Jr., Esq. (via ECF and email)